

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

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|---------------------------------|---|-------------------------------|
| FAIR ISAAC CORPORATION, a |) | Case No. 16-cv-1054 (WMW/DTS) |
| Delaware corporation, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| |) | |
| FEDERAL INSURANCE COMPANY, |) | |
| an Indiana corporation, and ACE |) | |
| AMERICAN INSURANCE |) | |
| COMPANY, a Pennsylvania |) | |
| corporation, |) | |
| |) | |
| Defendants. |) | |

**DECLARATION OF MICHAEL A. ERBELE IN SUPPORT OF PLAINTIFF
FAIR ISAAC CORPORATION’S OPPOSITION TO OBJECTION TO ORDER
GRANTING-IN-PART PLAINTIFF’S MOTION TO COMPEL**

I, Michael A. Erbele, declare as follows:

1. I am an attorney with Merchant & Gould P.C. I am one of the attorneys of record for Plaintiff Fair Isaac Corporation in the above captioned matter.
2. I make this declaration on my own information, knowledge, and belief in support of Plaintiff’s Opposition to Objection to Order Granting-in-Part Plaintiff’s Motion to Compel, filed concurrently herewith.
3. Attached hereto as Exhibit 1 is a true and correct copy of the May 8, 2019 Hearing Transcript.
4. Attached hereto as Exhibit 2 is a true and correct copy of the June 4, 2019 Hearing Transcript.

5. Attached hereto as Exhibit 3 is a true and correct copy of the Software License and Maintenance Agreement.

6. Attached hereto as Exhibit 4 is a true and correct copy of an excerpt of the February 26, 2019 deposition transcript of Lawrence Wachs.

7. Attached hereto as Exhibit 5 is a true and correct copy of Deposition Exhibit No. 241 to the January 18, 2019 deposition of Tamara Pawloski. This document is filed under seal.

8. Attached hereto as Exhibit 6 is a true and correct copy of an excerpt of the October 9, 2018 deposition transcript of Thomas Carretta. This document is filed under seal.

9. Attached hereto as Exhibit 7 is a true and correct copy of Federal Insurance Company's Response to Request for Production 90, served on January 28, 2019.

Dated: July 2, 2019

/s/ Michael A. Erbele
Michael A. Erbele